

SOUTHERN DISTRICT OF  
NEW YORK DIVISION

ETTIENNE-MODESTE JR,  
DEXTER  
(Plaintiff)

CASE No:

-V-

Hartford Police Dpt., United States,  
Port Authority Police Dpt, CT Lottery Division,  
Saint Francis Hospital, Consumer Protection,  
Hartford Hospital, ATT, Miguel  
Bloomfield Police Dpt, Chuck-N-Eddies,  
Farmington Police Dpt, Institute of Living,  
Hillsborough County Sheriff, Falkenburg County Jail,  
Ocean Blue Property Mangmt, Joseph Romano,  
Miami Beach Police Dpt., John Dough, et al.  
(Defendant(s))

COMPLAINT FOR VIOLATION OF CIVIL RIGHTS

(Prisoner Complaint)

NOTICE

Federal Rules of civil procedure 5.2 addresses the privacy and security concerns resulting from public access to electronic court files. Under this rule, papers filed with the Court should not contain: an individuals full social security number or full birth date; the full name of a person known to be a minor; or a complete financial account number. A filing may include only: the last four digits of a social security number; the year of an individuals birth; a minors initials; and the last four digits of a financial account number.

\* Except as noted in this form, plaintiff need not send exhibits, affidavits, grievance or witness statements or any other material to the clerks office with this Complaint.

In order for your complaint to be filed, it must be accompanied by the filing fee or an application to proceed in forma pauperis.

I. The Parties to this Complaint

A. The Plaintiff(s)

Provide the information below for each plaintiff named in the Complaint.

Attach additional pages if needed.

Name: DEXTER ETIENNE-MODESTE JR.

All other names by which you have been known:

Id Number: 200154154

Current Institution: Metro West Detention Center

Address: 13850 N.W. 41 street, Doral FL 33178

B. The Defendant(s)

Provide the information below for each defendant named in the Complaint, whether the defendant is an individual, a government agency, an organization or a Corporation. Make sure that the defendant(s) listed below are identical to those contained in the above caption. For an individual defendant, include the persons job or title (if known) and check whether you are bringing this complaint against them in their individual capacity or official capacity, or both. Attach additional pages if needed.

Defendant No.1

Name: Douglas Henley

Job title: CREC / Higher Learning

Shield Number: N/A

Employer: CREC

Address: 65 Blacksmith Dr, Middletown, CT

Individual Capacity  Official Capacity  Individual Capacity  Official Capacity

Defendant No.2

Name: John Doe

Job title: Police Officer

Shield Number: N/A

Employer: Hartford police Department

Address: 253 High St Hartford CT 06103

Individual Capacity  Official Capacity  Individual Capacity  Official Capacity

Defendant No. 3

Name : John Doe

Job title: Police officer

Shield Number: N/A

Employer: Hartford police Department

Address: 253 High st Hartford CT 06103

Individual Capacity  Official Capacity  Individual Capacity  Official Capacity

Defendant No. 4

Name: John Doe

Job title: Police officer

Shield Number : N/A

Employer: Hartford Police Department

Address: 253 High st Hartford CT 06103

Individual Capacity  Official Capacity  Individual Capacity  Official Capacity

Sheild Number: N/A

Sheild Number: N/A

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Employer: Consumer Protection

Address:

 Individual Capacity  Official Capacity

Defendant No. 15

Name: John Doe

Job title: Law Enforcement / Black Impala

Sheild Number: N/A

Employer: Law Enforcement

Address:

 Individual Capacity  Official Capacity

Defendant No. 17

Name: John Doe

Job title: Police officer

Sheild Number: N/A

Employer: Hartford Police Department

Address: 253 High St Hartford CT 06193

 Individual Capacity  Official Capacity

Defendant No. 19

Name: Joseph Romano

Job title: Police officer

Sheild Number: N/A

Employer: Port Authority Police Department

Address:

 Individual Capacity  Official Capacity

Defendant No. 21

Name: John Doe

Job title: Police officer

Sheild Number: N/A

Employer: Port Authority Police Department

Address:

 Individual Capacity  Official Capacity

Defendant No. 23

Name: John Doe

Job title: police officer

Sheild Number: N/A

Employer: Bloomfield Police Department

Address:

 Individual Capacity  Official Capacity

Defendant No. 16

Name: John Doe

Job title: Law Enforcement / Black Impala

Sheild Number: N/A

Employer: Law Enforcement

Address:

 Individual Capacity  Official Capacity

Defendant No. 18

Name: John Doe

Job title: Police officer

Employer: Hartford Police Department

Sheild Number: N/A

Address: 253 High St Hartford CT 06193

 Individual Capacity  Official Capacity

Defendant No. 20

Name: Miguel

Job title: Police officer

Sheild Number: N/A

Employer: Port Authority Police Department

Address:

 Individual Capacity  Official Capacity

Defendant No. 22

Name: John Doe

Job title: Police Officer

Sheild Number: N/A

Employer: Farmington Police Department

Address:

 Individual Capacity  Official Capacity

Defendant No. 24

Name: John Doe

Job title: police officer

Defendant No.5

Name: Dr. Zimmerman

Job title: Doctor

Sheild Number: N/A

Employer: Hartford Hospital

Address: 80 Seymour St Hartford CT 06106

 Individual Capacity  Official Capacity

Defendant No.7

Name: John Doe

Job title: Security officer

Sheild Number: N/A

Employer: Hartford Hospital

Address: 80 Seymour St Hartford CT 06106

 Individual Capacity  Official Capacity

Defendant No.9

Name: John Doe

Job title: State police officer

Sheild Number: N/A

Employer: Connecticut State police

Address:

 Individual Capacity  Official Capacity

Defendant No.11

Name: Saint Francis Hospital

Job title: Medical providers

Sheild Number: N/A

Employer: Saint Francis Hospital

Address:

 Individual Capacity  Official Capacity

Defendant No.13

Name: John Doe

Job title: Investigator

Defendant No.6

Name: John Doe

Job title: Security officer

Sheild Number: N/A

Employer: Hartford Hospital

Address: 80 Seymour St Hartford CT 06106

 Individual Capacity  Official Capacity

Defendant No.8

Name: John Doe

Job title: State police officer

Sheild Number: N/A

Employer: Connecticut State police

Address:

 Individual Capacity  Official Capacity

Defendant No.10

Name: John Doe

Job title: Police officer

Sheild Number: N/A

Employer: Bloomfield Police Department

Address:

 Individual Capacity  Official Capacity

Defendant No.12

Name: Connecticut Lottery Commission

Job title: Lottery Commission

Sheild Number: N/A

Employer: Consumer Protection

Address:

 Individual Capacity  Official Capacity

Defendant No.14

Name: John Doe

Job title: police officer

Employer: Farmington Police Department

Address:

Individual Capacity  Official Capacity

Defendant No. 25

Name: John Doe

Job title: Police officer

Sheild Number: N/A

Employer: Farmington Police Department

Address:

Individual Capacity  Official Capacity

Defendant No. 27

Name: John Doe

Job title: Police officer

Sheild Number: N/A

Employer: Hillsborough County Sheriff office

Address:

Individual Capacity  Official Capacity  Individual Capacity  Official Capacity

Defendant No. 29

Name: John Doe

Job title: Correctional officer

Sheild Number: N/A

Employer: Falkenburg County Jail

Address:

Individual Capacity  Official Capacity

Defendant No. 31

Name: Hartford Hospital

Job title: Medical providers

Sheild Number: N/A

Employer: Hartford Hospital

Address: 86 Seymour St Hartford CT 06106 Address:

Employer: Farmington Police Department

Address:

Individual Capacity  Official Capacity

Defendant No. 26

Name: John Doe

Job title: Police officer

Sheild Number: N/A

Employer: Hillsborough County Sheriff office

Address:

Individual Capacity  Official Capacity

Defendant No. 28

Name: Hillsborough County Sheriff office

Job title: Law Enforcement Agency

Sheild Number: N/A

Employer: Hillsborough County

Address:

Individual Capacity  Official Capacity  Individual Capacity  Official Capacity

Defendant No. 30

Name: Sabreena Carter-Coleman

Job title: N/A

Sheild Number: N/A

Employer: N/A

Address: 1668 Farmington Ave Apt. 1 Unionville CT 06085

Individual Capacity  Official Capacity

Defendant No. 32

Name: Institute of Living

Job title: Institution

Sheild Number: N/A

Employer: Hartford Hospital

Address:

Individual Capacity  official Capacity  Individual Capacity  official Capacity  
Defendant No. 33

Name: Lisa  
Job title: Realtor  
Sheild Number: N/A  
Employer: Ocean Blue Property Management  
Address:

Individual Capacity  official Capacity  Individual Capacity  official Capacity  
Defendant No. 34

Name: Ocean Blue Property Management  
Job title: real estate Company  
Sheild Number: N/A  
Employer: Ocean Blue Property Management  
Address:

Individual Capacity  official Capacity  Individual Capacity  official Capacity  
Defendant No. 35

Name: Benjamin Coleman  
Job title: N/A  
Sheild Number: N/A  
Employer: N/A  
Address: 126 Hampton St Hartford CT 06128

Individual Capacity  official Capacity  Individual Capacity  official Capacity  
Defendant No. 36

Name: State of Connecticut  
Job title: N/A  
Sheild Number: N/A  
Employer: N/A  
Address: N/A

Individual Capacity  official Capacity  Individual Capacity  official Capacity  
Defendant No. 37

Name: Luis Alsina  
Job title: Detective  
Sheild Number:  
Employer: Miami Beach Police Department  
Address: 1100 Washington Ave, Miami Beach 33139

Individual Capacity  official Capacity  Individual Capacity  official Capacity  
Defendant No. 38

Name: Beth Bloom  
Job title: U.S. Judge  
Sheild Number: N/A  
Employer: United States  
Address:

Individual Capacity  official Capacity  Individual Capacity  official Capacity  
Defendant No. 39

Name: John Doe  
Job title: Tow Truck Driver  
Sheild Number: N/A  
Employer: Chuck -N- Eddies  
Address:

Individual Capacity  official Capacity  Individual Capacity  official Capacity  
Defendant No. 40

Name: United States  
Job title: District Court  
Sheild Number: N/A  
Employer: United States  
Address:

Individual Capacity  official Capacity  Individual Capacity  official Capacity  
Defendant No. 41

Name: Chuck -N- Eddies  
Address:

Individual Capacity  official Capacity  Individual Capacity  official Capacity  
Defendant No. 42

Name: A. Amy

Sheild Number:

Sheild Number:

Employer:

Employer:

Address:

Address:

 Individual Capacity  Official Capacity  Individual Capacity  Official Capacity

Defendant No. 43

Defendant No. 44

Name: Smith

Name: A, Klements

Job title: police officer

Job title: Police officer

Sheild Number:

Sheild Number:

Employer: Miami Beach Police Department Employer: Miami Beach Police Department

Address: 1100 Washington Ave Miami Beach FL 33139 Address: 1100 Washington Ave Miami Beach FL 33139

 Individual Capacity  Official Capacity  Individual Capacity  Official Capacity

Defendant No. 45

Defendant No. 46

Name: F, Del castilo

Name: Shelandra Battle

Job title: Police officer

Job title: police officer

Sheild Number:

Sheild Number: 002-01190

Employer: Miami Beach Police Department

Employer: Miami Beach Police Department

Address: 1100 Washington Ave. Miami Beach FL 33139

Address: 1100 Washington Ave. Miami Beach FL 33139

 Individual Capacity  Official Capacity Individual Capacity  Official Capacity

Defendant No. 47

Defendant No. 48

Name: ATT

Name: Tom Buikus II

Job title: Communication Provider

Job title: Probation Officer

Sheild Number: N/A

Sheild Number: N/A

Employer: ATT

Employer: State of Connecticut

Address:

Address:

 Individual Capacity  Official Capacity Individual Capacity  Official Capacity

## II. Basis for Jurisdiction

Under 42 U.S.C §1983, you may sue state or local officials for the "deprivation of any rights, privileges, or immunities secured by the Constitution and [Federal laws]."<sup>1</sup> Under Bivens v. Six Unknown Named Agents of Federal Bureau of Narcotics, 403 U.S. 388 (1971), you may sue federal officials for the violation of certain Constitutional rights.

Federal officials (a Bivens claim)

state or local officials (a §1983 claim)

B. Section 1983 allows claims alleging the "deprivation of any rights, privileges, or immunities secured by the Constitution and [Federal laws]." 42 U.S.C. §1983. If you are suing under Section 1983, What federal Constitutional or Statutory rights do you claim is /are violated by state or local officials.

4<sup>th</sup> Amendment, 5<sup>th</sup> Amendment, 6<sup>th</sup> Amendment, 8<sup>th</sup> Amendment, 14<sup>th</sup> Amendment, Negligence, professional Malpractice, Malpractice Medical, Malpractice Business, Homestead residential foreclosure, Sexual Harrassment, Racial Discrimination, Manipulation, cyber stalking, Equal Protection Laws Etc.

C. Plaintiffs suing under Bivens may only recover for the violation of certain Constitutional rights. If you are suing under Bivens, What Constitutional right(s) do you claim is/are being violated by federal officials? Article VI, 14<sup>th</sup> Amendment, racial discrimination, Equal Protection laws, Conversion, Excessive force, Cyber Stalking Etc.

Multiple unidentified federal agents, stalking and assaulting and illegal searching residence without warrant.

D. Section 1983 allows defendants to be found liable only when they have acted "under color of any statute, ordinance, regulation, custom or usage of any state or territory or the District of Columbia." 42 U.S.C. §1983. If you are suing under Bivens, explain how each defendant acted under color of federal law. Attach additional pages if needed.

Miami Beach police Department acted under color of law based on race, gender and long hair. Hillsborough County Sheriff Opt, acted under color of law discriminating on place located due to race being black in a predominantly white area and age driving a new vehicle. NYPD acted under color of law connecting me to a crime specifically based on race and location assaulting me while handcuffed. State of Connecticut violated Equal Protection Clause as every other agency in this suite.

### III. Prisoner Status

Indicate whether you are a prisoner or other confined person as follows.

(check all that apply)

Pre-Trial Detainee

- Immigration Detainee
- Convicted and sentenced prisoner
- Convicted and sentenced federal Prisoner
- other (explain)

#### IV. Statement of Claim

State as briefly as possible the facts of your case. Describe how each defendant was personally involved in the alleged wrongful action, along with the dates and locations of all relevant events. You may wish to include further details such as the names of other persons involved in the events giving rise to your claim. Do not cite any cases or statutes. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

A. If the events giving rise to your claim arose outside an institution, describe where and when they arose. 2012 Assaulted by Hartford police, 2014 Assaulted by Hartford and Bloomfield police and shot at, 2017 Assaulted by NYPAPD while handcuffed, 2012 Deemed to be committing fraud for \$8.4 million, 2020 Wrongfully stopped search and seized by Hillsborough police 2018 Illegally search and interrogated by Farmington police. 2019 racially discriminated by Farmington police.

B. If the events giving rise to your claim arose in a institution, describe where and when they arose. July-August 2020 injured and medical negligence in Falkenburg County Jail, harassed by C/O taken as a joke. In 2012 medical malpractice wrongfully medicated against will deemed not to take medication and injected. In 2012 Wrongfully medicated in Saint Francis Hospital.

C. What date and approximate time did the events giving rise to your claim(s) occur. 2012, April 2012, February 2014, 2017, October 2018, 2019, 2020, July 2020, December 2020

D. What are the facts underlying your claim(s)? (For Example)What happened to you? Who did what was anyone else involved? Who else saw what happened?)

Assaulted by multiple Hartford Police on two occasions, Assaulted by NYPAPD while handcuffed to wall. Sexually harassed and racially discriminated by Hillsborough Sheriff, Cyber stalk by IT Tech, Medicated against will at "to be medicated against will at St. Francis Mt. Sinai physc division, wrongfully admitted to St. Francis Hospital medicate only suppose to take X-rays, racially discriminated by miami Beach police and assaulted.

If you sustained injuries related to the events alleged, describe your injuries and state what medical treatment, if any, you required and did or did not receive.

corneal abrasion, rudimentary ribs, cracked rear left and right teeth, lumbar and flexion damage to back, contused wrist, torn ligaments in ankle,

## VI. Relief

State briefly what you want the Court to do for you. Make no legal arguments. Do not cite any cases or statutes. If requesting money damages, include the amounts of any actual damages and / or punitive damages claimed for the acts alleged. Explain the basis for these claims.

1.5 Billion Dollars for punitive and compensatory Damages. Legal prosecution to law enforcement for Crime Committed all medical bills paid. Removal of Medical license due to Malpractice

## VII. Exhaustion of Administrative Remedies Administrative procedures.

The Prison Litigation Reform Act ("PLRA"), 42 U.S.C §1997 e(a), requires that "No action shall be brought with respect to prison conditions under section 1983 of this title, or any other federal law, by a prisoner confined in any jail, prison, or other correctional facility until such administrative remedies as are available are exhausted." Administrative remedies are also known as grievance procedures. Your case may be dismissed if you have not exhausted your administrative remedies.

A. Did your claim(s) arise while you were confined in a jail, prison, or other correctional facility?

Yes

No

If yes, name the jail, prison, or other correctional facility where you were confined at the time of the events giving rise to your claim(s).

B. Does the jail, prison, or other correctional facility where your claim(s) arose have a grievance procedure?  yes

No

Do Not know

C. Does the grievance procedure at the jail, prison, or other correctional facility where your claim(s) arose cover some or all of your claim(s)?  yes

No

Do Not know

If yes, which claim(s)?

D. Did you file a grievance in the jail, prison, or other correctional facility where your claim(s) arose concerning the facts relating to this complaint?  yes

No

E. If you did file a grievance:

1. Where did you file the grievance?

N/A

2. What did you claim in your grievance?

N/A

3. What was the result if any?

N/A

4. What steps if any, did you take to appeal that decision? Is the grievance process completed? If not, explain why not. (Describe all efforts to appeal to the highest level of the grievance process.)

N/A

F. If you did not file a grievance:

1. If there are any reasons why you did not file a grievance state them here:

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if you did not file a grievance but you did inform officials of your claim, state who you informed, when and how, and their response if any:

I informed the sgt on shift, immediately who took me to the clinic in a wheel chair, where I was looked at iced and given

G. Please set forth any additional information that is relevant to the exhaustion of your administrative remedies.

( Note: You may attach as exhibits to this complaint any documents related to the exhaustion of your administrative remedies.)

#### VIII. Previous Lawsuits

The "three strike rule" bars a prisoner from bringing a civil action or an appeal in federal court without paying the filing fee if that prisoner has "on three or more prior occasions while incarcerated or detained in any facility, brought an action or appeal in a court of the United States that was dismissed on the grounds that it is frivolous, malicious, or fails to state a claim upon which relief may be granted, unless the prisoner is under imminent danger or serious physical injury." 28 U.S.C § 1915(g).

To the best of your knowledge, have you had a case dismissed based on this "three strike rule"?  Yes

No

If yes, state which court dismissed your case, when this occurred, and attach a copy of this order if possible.

A. Have you filed other lawsuits in state or federal court dealing with the same facts involved in this action?  Yes

No

B. If your answer to A is yes, describe each lawsuit by answering questions 1 through 7 below. (If there is more than one lawsuit, describe the additional lawsuits on another page, using the same format.)

1. In 2010 Douglas Henley told me to stop talking to his daughter or he will kill me and my entire family.
2. I was later taken to Middletown Court in which Douglas Henley requested for protective order.
3. Showing the court me and his daughter later spoke to each other with her consent as she notified me that she was afraid of her father.
4. Middletown Court later still granted Douglas Henley a restraining order against I and his daughter.
5. Some time later in 2011 I was taken to Hartford police ppt. on jennings Rd. where I noticed Douglas Henley M45 infiniti following.
6. officers took me into the station where I was assaulted by multiple male officers as two female officers watched.
7. officer John Dough #1 threw me to the ground
8. As officer John Dough #2 slammed his knee into my back and stayed on top of me.
9. officer John Dough #1 and officer John Dough #3 began throwing blows to my head.
10. As my head hit the ground while officer John Dough #1 and John Dough #2 continued hitting me my rear left tooth broke while officer John Dough #2 continued jamming his knee into my back.
11. It was then a female officer stated the marshalls are here.
12. Officers John Dough #1, John Dough #2, and John Dough #3 stop assaulting I and picked me up off the ground telling me I better keep my fucking mouth shut. As one also stated you lucky we didn't kill you.
13. I am passed over to the U.S. Marshalls custody where I am transported and placed in a bullpen at 1st lafayette st.
14. In which I sat there the entire weekend awaiting to see the judge.
15. upon seeing the judge I was placed in a holding cell alone.

Hartford Hospital Triage purple pad uncertain of what  
was going on.

17. I was later transferred to the Institute of living.

18. Where I was deemed in probate Court not to take medication.

19. Upon telling the nursing staff this with the probate Court paper in my hand I was forced to take the medication and told they can make me take it if I don't.

20. As I did not take the medication I was surrounded by nursing staff and Dr. Zimmerman who called for hospital security.

21. Dr. Zimmerman stated to me its mandatory I take these medication that they were needed and the paper from probate court did not say I do not need to take the medication.

22. Hartford Hospital security officer John Dough #1 grabs me on one side as the other security officer John Dough #2 grabs me on my other side pulling my shoulders and dragging me down the hallway.

23. Hartford Hospital security officer assisted by Connecticut state police and Hartford hospital staff.

24. I am dragged all the way to a backroom and pinned to the ground by Hartford Hospital Security officer John Dough #1 and John Dough #2 including Connecticut state police officer John Dough #1 and John Dough #2 while being assisted by nurses of Hartford Hospital.

25. As Dr. Zimmerman request injection of some medication as restraint, nurse John Dough of Hartford hospital injects me with some sureng.

26. I must of passed out due to injection awaken to be on a hard bed more like a table strap down.

27. Upon seeing nurse I am unstrap and allow back to a regular room told sorry you do not need to take any medication.

28. I stay in "IoL" (Institute of Living) for some time until released

29. In a park in Hartford CT officers ask if I was born in 1970 randomly.

30. Later in 2012 Douglas Henley contacts my father phone in which his wife JoAnn Lawrence answers the phone. Page 14

31. Moments after there is a knock at the door.

32. It is Bloomfield police Department officer John Dough #1 at the door.

33. Officer John Dough #1 of Bloomfield police opt. takes me out of my residence at 53 merriam Ave. Bloomfield CT #6#62, in handcuffs and takes me outside putting me into a ambulatory vehicle passing me over to EMT's.

34. I am then driven down the street to St. Francis Mount Sinai hospital in Hartford, CT.

35. Where I am sent to room 71# in a psychiatric wing.

36. I request a probate court while there deemed not to take medication which I was still forced to take.

37. Upon being released I walk to petro pantry gas station on boothbay st, Hartford CT #612# purchasing lottery tickets and food.

38. April 2#12 I have my father take me to check lottery tickets at lottery commission in Rocky hill CT.

39. As I enter the lottery commission you hear congratulations and bell ring.

40. As I walk over to service desk to check tickets clerk checks tickets most saying not a winner, one ticket scanning not processed.

41. Clerk does not give tickets back

42. I request tickets from supervisor which is stamped void not processed and the others not a winner stamped void and returned.

43. I purchase a few lottery tickets and leave out.

44. Some weeks later I notice a strange white man walking around residence 53 merriam Ave. Bloomfield CT #6#62 at the time.

45. As I walk outside and confront this man he shows me photos in a folder of me at the lottery commission and serves me a paper stating I am making fake lottery tickets.

46. This man John Dough hands me a card stating he is a investigator with the consumer protection, Dump gaming.

47. I was taken to court in New Britain CT for 58.4 million claiming me as fraud Warranted and arrested in case to ultimately be dismissed and found not guilty.

48. In 2#12 I go to a doctors appointment where I am directed to the main St. Francis Hospital in Hartford CT #612# to take x-rays.

50. In hospital I am attacked by officer John Dough Who has his knee slammed  
against my neck and restraint, held down by other officers and staff.

51. I am stuck with some kind of medication in this hospital.

52. In which I was released and told that they made a mistake I was only supposed to take X-rays which were taken prior to me leaving the hospital at 11pm and arrived at 1am for X-rays only.

53. In February 28 2014 a impala with New York license plate at full speed nearly deliberately struck me on the driver side of my 2001 nissan maxima.

54. I drove up so that I would not be struck by vehicle.

55. upon pulling into my driveway I was rear ended by this impala with new york license plate.

56. As I am rear ended my head hits the steering wheel very hard.

57. surrounded by multiple Hartford and bloomfield police cruisers.

58. officer John Dough of the Bloomfield police Opt. Instantly runs to my driver door and fires a shot at my vehicle in the driveway of my residence at 53 merrimack bloomfield CT #6992.

59. you hear multiple officers shouting stop cease fire.

60. When multiple officers open my passenger door surrounding car with guns.

61. officer John Dough in black impala with other officer John Dough, open my driver side door, pulling me to the ground twisting my arm back as both officers started throwing blows to my head and mushing my head into the dirt assisted by John Dough of Hartford police department.

62. As other officers and people arrive assault stops.

63. I am picked up in hand cuffs search and placed in a Hartford police Cruiser.

64. I am then taken back out of the cruiser by officer John Dough of Hartford police department who re-searches me pulling and ripping my clothing off in the middle of the street

65. Sent to Connecticut Valley Hospital during time I am deemed competent by court as state was trying to keep me in the hospital even though I did not need medication.

66. In 2017 I was assaulted by the port Authority police Department.
67. officer Joseph Romano grabs my hand with lit cigarette I am smoking and twist my hand to the top of my shoulder with his other hand pushing my face against the glass.
68. officer Joseph Romano pulls my right arm up to my left hand with my face pressed against the door glass placing me in handcuffs.
69. While upstairs in handcuff against the wall I am attacked by officer miguel who grabs my head with his thumbs goaging out my left eye out and banging my head against the brick wall multiple times approximattly 6 times then throwing me to the ground.
70. Handcuffed hanging on the ground arms pulling from wall officer John Dough jams his knee into my back as officer miguel is pulling my pants off.
71. officer John Dough throwing blows to my face with officer miguel who begins to start chocking me out as I am unable to breath my right rear tooth crack from head hitting the ground.

72. I am sent to Bellvue Hospital with my face messed up told I have corneal abrasion in which my vision is impared.

73. In 2019 I was harrassed by arresting officer John Dough Were I was standing at the bus stop.

74. officer John Dough noticed me and stop the cruiser shouting out my government name.

75. officer John Dough of the farmington police Dpt. persisted in after me refusing a ride stating I am under arrest for being in violation of a protective order.

76. As officer John Dough states a guy like me does not belong in farmington.

77. As I continued to probation in 2019 probation officer Tom Buikus II Was Very discriminitive and manipulating.

78. On multiple occasions Mr. Buikus II Would tell me I smell and I need to cut my hair I look like a caveman. Stating to my wife that she need to leave me who would want to be with that you can do better.

79. Tom Buikus II Would contact Farmington police Dpt. Where he used to work and would meet with them every tuesday as he states to me I have officers watching you and your wife, I suggest you stay out of farmington.

80. In 2018 Farmington police officer John Dough and John Dough violates me

81. While parked in a visitor parking space outside of Sarita Carter residence as we both sat in the car.

82. Farmington police officer John Dough walks up to my rental car window while car is parked asking what we are doing parked out here.

83. As Sarita Carter Verifies that this is her residence officer John Dough of Farmington Police department without probable cause pulls my driver door open telling both of us to exit the vehicle.

84. officer John Dough tells me to stand at my trunk and do not move as male officer John Dough attempts to search Sarita Carter and checks her bag.

85. officer John Dough of farmington police Opt. ask me to spread my legs putting me down, sexually harrassing me feeling between my legs multiple times asking where is the drugs at.

86. officer John Dough of Farmington police Opt. notice a Condom and Wrapper on the grass and Continues to harrass and discriminate I and Sarita.

87. officer John Dough of farmington police Opt. states to me I know that's your Condom that's just fucking nasty looking over to Sarita Carter officer John Dough States to her We know that's his Condom just tell us What We Want to hear We can take him to jail, what are you two doing sitting here.

88. officer John Dough of Farmington police Opt. Tells me to sit in the car and shutt up as Sarita tells me she does not want to talk to the police they continue to harrass us and try to manipulate her into going into her apartment and leaving me with the police as she states her mom did not arrive yet.

89. Farmington police officer John Dough persist on racially discriminating against I Stating I do not want to see you out here again or we going to have a problem as officers had on a green tactical bullet-proof vest, short white male.

90. officer John Dough notices a bud of marijuana in my door handle as I am involuntary search with no probable cause Just discrimination toward me as a black male parked in farmington.

91. I explain to officer of my medical marijuana card and that's why the car is off, officer John Dough writes a ticket for \$50.00 possession of marijuana.

92. In 2014 my 2001 nissan maxima was seized by Hartford police Opt. Without any seizure of vehicle and sent to a tow yard on bond st. Hartford CT \$6120.

93. On July 26, 2020 arresting agency Hillsborough County Sheriffs office.

94. I was immediately followed from a wa-wa in clearwater, Hillsborough County Florida.

95. Without violating any traffic law or giving any probable cause I am siren and loud speakered to pull over.

96. Upon pulling over to the side, I am rushed at gun point.

97. Officer John Dough opens the door and screams nigga you made the right decision.

98. Officer John Dough pulls me out of the vehicle.

99. Arms are twisted as I am placed in handcuffs.

100. My vehicle begins rolling as officer John Dough gets inside the car as I am placed into the back of a police car.

101. Officer John Dough proceeds to drive my car down the street into a parking lot parking in a parking space.

102. As the police Cruiser I was in followed officer John Dough to parking lot.

103. Officer John Dough drives me in the Cruiser to the same parking lot parking next to my vehicle.

104. Officer John Dough who drove me into the parking lot begins to search me at the rear of his vehicle.

105. I am placed back into the Cruiser, in which the officer gets in, upon asking what am I being charged with officer John Dough states I will charge you with whatever he wants, stating he is pretty sure that is stolen anyway, including everything in it referring to my vehicle.

106. Officer John Dough who drove vehicle begins to start searching my vehicle opening the trunk searching also without probable cause.

107. I am then taken out of Cruiser officer John Dough searches me a second time, told to place my hands on trunk of cruiser where I am directed to spread my

108. Officer John Dough feels between my legs and ass searching all my pockets, then placed in handcuffs and put back in cruiser.

109. Multiple other officer in unmarked cars wearing regular clothing arrive on scene.

110. Officer John Dough supervisor in regular clothing approaches the marked cruiser, opens the door and ask me what is a gay like me doing in an area like this.

111. Officer John Dough supervisor states if I were a little closer to where I live also Hillsborough County he would of let me drive home.

112. An illegal stop search and seizure was conducted by Officer John Dough who drove car into parking lot and John Dough who police cruiser I was sitting in leaving my money a 1977 pence Euro and other Euro's and U.S. Currency all over the seat and center console of my vehicle.

113. Officer John Dough upon asking tells me not to worry about any of my belongings.

114. Another supervisor John Dough in a marked pick-up truck transfers me into his cruiser from officer John Dough to ensure my safety as officer threatened my life.

115. Officer John Dough supervisor drops me off directly at Falkenburg jail, I am not ever taken to a police station first.

116. During incarceration I trip on uneven pavement unable to walk.

117. Correctional officer John Dough takes it as a joke as I am finally picked up and placed in a wheelchair and pushed to medical.

118. In Severe pain I am not given proper medical treatment due to no doctor on staff.

119. Told doctor will follow up with me no doctor follows up with me.

120. X-rays later taken no bone broken told I may have torn my ligaments.

121. Attempting to use one crutch and hold my dinner correctional officer John Dough walks to my bed area and takes my other crutch.

122. Appointment set for doctor not ever sent on day of appointment neither sent to hospital for MRI of leg as told by clinic.

123. I address Correctional officer John Dough from my bunk asking for my

124. Correctional officer John Dough walks up behind me and snatches my other crutch yelling at me to get up and walk.

125. I state this is not a joke I can not walk.

126. Correctional officer John Dough grabs me gripping my shoulder pulling it to force me up.

127. Unable to apply pressure on left leg Correctional officer John Dough assisted by another Correctional officer John Dough drags me lifting both shoulders as I scream in pain both officers drag me to an in unit holding cell.

128. As Correctional officer John Dough places me in the cell he states I will hurt you and make sure it hurts forever now shut-up and stop acting.

129. Supervisor eventually arrives in unit who sends me in a wheelchair to medical and I am issued a new set of crutches which one was broken and all the clinic had to assist my walk.

130. I Am released from Falkenburg jail in Tampa around August 22, 2020.

131. Case in Tampa was dismissed and I was unlawfully arrested and sat in jail for a crime I did not commit.

132. Nearly losing my Apartment and everything I have due to false imprisonment.

133. In 2019 were I resided at 1668 Farmington Ave. Apt. 1 were I paid rent, I stepped outside to smoke upon attempting to re-enter the apt. after, the door was slammed in my face.

134. In result a piece of glass broke cutting me in my hand.

135. As I waited and walked away with no where to go Farmington police Dpt. arrived.

136. Sabreena Carter-Coleman comes outside with her daughters, Sabreena states to the police that she does not want me to go to jail just leave.

137. Farmington police run my name officer John Dough who states there is a warrant out of Hartford, I explain that I was just recently picked up and released on warren

138. Farmington police officer John Dough searches me taking my medical marijuana container and keys out of my pocket in which I direct him to give them to my wife to hold.

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139. officer John Dough deliberately opens my medication as it is sealed in - Correct Container and showed him valid license to carry in Wallet.

140. officer John Dough proceeds to pour out my medication and states I can buy more when I get out, that he will give the keys to my wife if there anything else you want to leave with her.

141. I am released and picked up by my mother same night.

142. In May 2019 I proceed to 1668 Farmington Ave Apt. 1 Sabreena Carter-Coleman says hold on upon knocking on the door as I wait for the door to open it does not farmington police Dpt. arrives.

143. Sabreena Carter - Coleman lets officers inside as I stay outside waiting

144. Sabreena Carter - Coleman violates me and hands all paperwork of 1983 lawsuit over to the farmington police Dpt.

145. Sabreena Carter - Coleman later tells me how she went through my confidential paperwork and something must be wrong with me if the police did that to me.

146. Sabreena Carter - Coleman continues to state that I must be disillusioned they need to put me back in CVH (Connecticut Valley Hospital) or the IOC (Institute of living) or where ever I came from maybe I need to take Sarita with me.

147. Upon giving Sarita Carter 2 silver dollars both 1 dollar bill silver certificates to hold Sabreena Carter - Coleman kept them saying that Sarita does not have them, well she does and I will not be getting them back.

148. Sabreena Carter - Coleman states that she took the title and car keys to my BMW which I still have not been given back yet.

149. In 2020 Sabreena Carter - Coleman lied to me telling me her daughter Sarita Carter was sleeping with some one another man and I need to pay rent by myself, trying to manipulate me.

150. Sabreena Carter - Coleman proceeds to tell me Sarita is pregnant and that she is in Florida with me knowing she is not. and she purchased her a train ticket to Connecticut, after leading us into a scam.

151. Sabreena Carter - Coleman continues to manipulate and play games with me telling me that my wife is in Florida in palm Beach Hospital pregnant.

152. Upon calling and driving to palm Beach Hospital there is no record of a

153. Returning Call to Sabreena Carter-Coleman she continues to play game and tell me how Sarita is in the Hospital I need to call or go there, upon stating they said no Sarita Carter in the Hospital Sabreena Carter-Coleman to state maybe she is in jail.

154. Sabreena Carter-Coleman has filled divorce papers against me and her daughter forcing her to do it or telling her to find some where else to live in which Sarita and I did not want to go to court on said date.

155. Sabreena Carter-Coleman has been a thief and manipulating on multiple occasions costing me money that is not ever replaced and causing me to drive around searching for my wife telling me she is in the hospital pregnant and is not causing me to crash my vehicle in the process.

156. In 2020 after being scammed on a rental property I meet with Lisa from Ocean Blue Property Management Correct realtors of property.

157. Lisa informed me and Sarita that she is sorry the property 1209 E 124TH Street Apt. G Was illegally listed and is not really in condition to be rented.

158. Upon meeting with Lisa at her office she advised that since we already are staying in the apartment she will write up a lease and we need to pay her rent now not the other person.

159. Rent was set at 55\$ on the Apartment by John Dough (ALLEN) the Scammer

160. Lisa informed Sarita and I rent would stay the same 55\$ as long as we were willing to take the place in the condition it is in. Even though we're not suppose to rent this unit still.

161. Sarita and I agreed and signed lease in person as Lisa told us not to worry about the security deposit and rent would stay the same she understands what we went through even though she has not got Scam before.

162. Lisa then gives us the ocean Blue Property Management website to make payments for rent, view lease and other available properties.

163. After signing the lease Lisa stated actually I have to raise the rent to 65\$ (Six hundred and fifty dollars) a month to help pay monthly on the security deposit we did not need to pay.

164. Some time goes past Lisa is in contact with us asking if we want to move

into another one of their properties they have available.

165. We inform Lisa that rent is to high for the other properties maybe in a few months.

166. Lisa continues to call and harass us about paying 1,000 (one thousand dollars) for the security deposit that she said not to worry about.

167. My wife does research and notice Ocean Blue property Management has two different websites one with words spelled incorrectly.

168. Questioning Lisa what website is the correct website she is uncertain and explains how one of her family members made the site for them incorrectly.

169. Some time passes nearly around august I am about to pay rent when there is no power in the apartment.

170. Upon signing the lease Lisa informed and is stated in lease that electricity, sewerage, trash pick up, water are all included.

171. I call Ocean Blue Property Management in which I speak with the Secretary that answers calls telling her my power is out.

172. Secretary checks my leasing account and tells me to contact FPL (Florida Power Light) for further help.

173. Upon contacting FPL (Florida Power Light) I am told that I am not able to make a payment without the password to the account and I need to contact the owner of account.

174. So I call Ocean Blue Property Management back the Secretary tells me only Lisa has the password to the account and she is not in, I will leave a note for her to contact you.

175. Over a week passes going into another month of rent and my lights and complete power is still out still no word from Lisa and called ocean Blue property Management multiple times.

176. Having to purchase multiple amenities including food unable to use stove or shower trying to use candles and flashlights unable to charge cell phone to make calls to resolve issue while on crutches, unable to walk.

177. Still no word from Lisa I have to leave to get a hotel room so I am able to shower etc.

178. Upon being in Miami, Florida staying in hotel rooms for work one night returning from LAX I am attacked while attempting to enter a store which is 24hrs, that is closed.

1e who pushes her arm against my shoulder refraining me from walking.

180. Prior to Shelandra Battle saying anything I notify the officer that I was attacked by some random lady, and I'm trying to get home.

181. Officer Shelandra Battle acted under color of law responding I don't care what happened to you or were you going I need you to empty your pockets.

182. As I go to empty my pockets as directed Officer Shelandra Battle grabs my wrist twisting it putting me in handcuffs saying I will do it for you.

183. As everything that was in my hand flies out Officer Shelandra Battle makes me sit on the c-wall, upon asking her am I under arrest she states no.

184. Officer Shelandra Battle makes me walk to her police cruiser upon putting me into her cruiser I ask Shelandra Battle if I am under arrest she states no.

185. Crime Scene Tech A. Amy opens Cruiser door directing me to get out of the car, upon getting out of Cruiser A. Amy takes multiple photographs with her flash blinding me directly in my face.

186. Officer Shelandra Battle directs me to get back in the Cruiser ms. Battle begins to pull off. I ask if I am under arrest were are you taking me and she does not respond.

187. Officer Shelandra Battle pulls into the Miami Beach Police Department on 1188 Washington Ave. Miami Beach, I ask again if I am under arrest again ms. Battle states no he just wants to talk to you that's when Detective Luis Alsina opens the rear door of cruiser directing me to get out of cruiser.

188. I am placed in a holding cell and left to sit there for hours.

189. Detective Alsina walks past when I ask what's taking so long, am I under arrest, Alsina states no, and that can change & get to you when I finish.

190. Some time after Detective Alsina brings me into a room and I ask am I under arrest he states no I just need you to answer a few questions.

191. I state to Dt. Alsina if I am not under arrest I am not answering any questions, what do you need to know, and am I free to go. Alsina states let me ask you this first of all what is a guy like you with hair like that doing out here in the first place.

192. I ask what that suppose to mean. Detective Alsina then gets an attitude saying he can put me in jail for whatever he wants just answer the questions are you

193. Dt. Alsina walks back in the room taking me back into the holding cell, telling me im under arrest no miranda warning ever given entire time. I state what you trying to hurt me when Alsina clinches his gun stating if I want to hurt you I can make it hurt.

194. Officer Smith Intervenes as I state I was not talking to you officer Smith says I got his ass.

195. Detective Alsina opens cell door as officer Smith tells me to step out the cell then states dont make me have to take you out the cell I will hurt you.

196. Officer Smith then pushes me against the wall with force putting me in handcuffs squeezing them against my wrist.

197. Officer Smith grabs my upper arm under my shoulder dragging me screaming Walk faster lets go, unable to due to injuries.

198. Upon getting down the hallway officer Smith pushes me into a closed sally port door hitting my chest and head against door prior to detective Alsina opening door.

199. outside in front of transport van officer Smith squeezes handcuffs tighter on my wrist as detective Alsina opens Vans door officer Smith pushes me into the van while standing on Van ledge officer Smith screaming I will fuck you up.

200. Prior to Van door being closed I inform Dt. Alsina and officer Smith the handcuffs are to tight and my hand is numb I can not feel it, officer says good and detective Alsina says I will make it so you never see the light of day again.

201. I am transported to TGK Correctional Facility were officer Smith is told he can take the personal property to TGK Intake window in which he says this stuff is going back with him, no Search Warrant or Seizure is made all my personal property is taken to Miami Beach Police Dpt. officer Smith only putting my cash in machine.

202. In 2020 upon calling Chuck-n-Eddies Junk Yard I was told by tow truck driver John Dough when he is 5 minutes away or arrives he will call and without the title my 1999 BMW 323i would not be picked up, I noticed truck driver John Dough I have to still remove a few items from vehicle when he arrives.

203. With 1983 Confidential Information and a mig Welder in trunk of car I did not want car picked up as I am the owner and was told by truck driver John Dough

204. Upon returning to residence to go to my car it is not there, Benjamin Coleman states that he had them take the car without the title or the car key and I was never contacted by him, Chuck-N-Eddies or tow truck driver John Dough.

205. Benjamin Coleman Signed and accepted the check for vehicle without my consent or contacting me.

206. Upon noticing this I contacted Chuck-N-Eddies about this issue as had a different purchaser for vehicle in which John Dough the manager stated that there was no record of a BMW picked up or dropped off by truck driver John Dough when originally stated truck driver was in route.

207. Manager John Dough stated the driver did not ever pick up the BMW he will verify when the driver arrives.

208. Upon calling next day and going to Chuck-N-Eddies Manager verifies that truck driver John Dough said he did not ever pick up the BMW.

209. In May 6 of 2019 case H14H-CR18-#699821-S Sarita Carter signs a non-prosecution form due to my sister Kurstin Coleman calling the police in December of 2018 for no reason.

210. As my hair was stuck to Sarita Carter piercing as we bumped heads she made loud noise in pain as we argued stuck together on how to remove it from her piercing.

211. As the police are arriving Kurstin Coleman steps outside the house of 126 Hampton St. Were I was resident at the time, screaming she called police.

212. Sarita Carter and I both get arrested as she is released and I am not.

213. Upon Sarita filling out a non-prosecution form the state refuses to release me without prosecution and ordered to take probation or stay in jail.

214. I am given domestic violence probation when there was no domestic violence and no alleged victim to face as a non-prosecution form was filled.

215. Kurstin Coleman lied to the Hartford Police about what occurred, Hartford police officer John Dough drew his firearm pointed at me upon arriving on scene for no reason as Sarita and I both walked separate ways officer John Dough was ready to discharge his firearm without verifying me as a suspect as there should have been no police contact.

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216. Officer John Dough stated he would not be arresting us upon checking my drivers license he stated I do not live at this address notifying officer John Dough I do and it is not on my drivers license but I do live at this address and that is my car parked in the driveway.

217. As my mother Monique Coleman Was sleep officer John Dough States if Kurstin Coleman Verifies that I live here he will not be arresting us.

218. Kurstin Coleman lied to police stating that I do not live there and that is not my car in the driveway.

219. Upon Sarita Carter finding out I was still in jail she filled a non-prosecution form in which the state of Connecticut still pursued prosecution unlawfully.

220. The state of Connecticut demanded I do a program that I already took years prior due to Douglas Henley calling the police on me and sending me to court for no reason.

221. In which Douglas Henley continued to cyberstalk me and contact my family based on me and his daughter consentually talking.

222. On April 5, 2022 I received an order of dismissal from the United States District Court Southern District of Florida incorrectly notified as plaintiff Jawayne Fripp, v. Defendant Rick Bradshaw, et al.

223. This document was signed by United States District Judge Beth Bloom.

224. Document is stated copies to, Counsel of record Jawayne Fripp, Process # 0432794 palm Beach County Jail Inmate mail / parcels post office Box 2A716 West palm Beach, FL 33416

225. The United States District Court Southern District of Florida mailed out document to me with my case # on top labeled case : 1:21-cv-20637-BB Document #9 entered on FLSO Docket #4/#5/2022 and in the center under title of court case No. 22-cv-80317-BLOOM

226. Two other papers were attached and mailed from same district court of U.S. titled with my name and jail number, METRO WEST DETENTION CENTER 13850 N.W. 41st Doral FL 33178.

227. Case closed on 03/26/2021 order dismissing / closing case, document filed in wrong case by the U.S. District of Southern District of Florida following

228. U.S. District court made error in filling my case stating on March 4, 2022 plaintiff Jawayne Fripp filed a Complaint pursuant to 42 U.S.C § 1983 ("Complaint") and an application to proceed in district court without prepaying fees or costs ("application")

229. Stated that on march 4, 2021 the court granted plaintiffs application but dismissed the complaint with leave to amend. Plaintiff was ordered to file an amended complaint on or before March 25, 2022.

230. U.S. District court made error in filling of cases and sending incorrect information, Judge Beth Bloom signed document in error and my amended Complaint was not ever acknowledged or mixed up.

231. Officer Klements in December of 2020 swears to a false police report committing perjury willfully giving false testimony under oath in judicial proceeding alleging without proof or before proving.

232. Klements alleged things that did not ever occur sworn and undersigned before Del Castillo who affirming sworn that Complaint was true.

233. Incarcerated without a deduction of bail at any time, in 2 years.

234 Upon Signing a phone Contract of 2 years with ATT and my Iphone on monthly payments transferring my number to carrier from previous carrier.

235. My phone is randomly disconnected after making a payment to phone bill and my phone nearly paid off.

236. As a Customer I was told by ATT my service is not needed and I can keep my Iphone, I was unable to retrieve my phone number due to service being randomly terminated.



Plaintiff(s) Hartford Police Dept., et al., Hillsborough County Sheriff Dept., et al.,  
Port Authority Police Dept., et al., Michael, et al,

Defendant(s) DEXTER ETIENNE - MODESTE JR

2. Court (if federal court, name the district, if state court, name the county and state) U.S. District Court District of CT case: 3:21-cv-00288, U.S. District Court Southern District of N.Y. case: 1:21-cv-01162, U.S. District Court District of Tampa case: 8:21-cv-00762-SDM-CPT, U.S. District Court Southern Dist. of Fl. case:

1:21-cv-20637  
1:21-cv-20637-B

3. Docket or Index number:

3:21-cv-00288 / 1:21-cv-01162 / 8:21-cv-00762-SDM-CPT / 1:21-cv-20637 / 1:21-cv-20637-B

4. Name of judge assigned to your case:

Judge Beth Bloom / Colleen McMahon / Stefan R. Underhill / Christopher P. Tuite /  
Steven D. Merryday

5. Approximate date of filing lawsuit:

2/17/2021, 2/16/2021, 4/12/2021, 5/5/2021, 11/22/2021

6. Is case still pending?  Yes

No

If no, give the approximate date of disposition.

2/17/2021, 2/16/2021, 4/12/2021, 5/5/2021, 11/22/2021

7. What was the result of the case? (For Example: Was the case dismissed? Was judgement entered in your favor? Was the case appealed?)

Sent to Second Circuit, Dismissed due to mailing issues in Corrections.  
Dismissed failed to amend, Dismissed w/out Financial Certificates uncertified.  
Moot Dismissed.

C. Have you filed other lawsuits in state or federal court otherwise relating to the conditions of your imprisonment?  Yes

No

D. If your answer to C is yes describe each lawsuit by answering questions 1 through 7 below. (If there is more than one lawsuit, describe the additional lawsuits on another page, using the same format.)

1. Parties to the previous lawsuit

Plaintiff(s) N/A

N/A

2. Court (if federal court, name the district; if state court, name the county and state)

N/A

3. Docket or Index number

N/A

4. Name of judge assigned to your case

N/A

5. Approximate date of filing lawsuit

N/A

6. Is case still pending?  Yes

No

If no, give the approximate date of disposition

N/A

7. What was the result of the case? (For Example: Was the case dismissed? Was judgement entered in your favor? Was the case appealed?)

N/A

IX. Certification and closing

Under federal rule of civil procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint:

- (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation;
- (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law;
- (3) The factual contention have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation.

(4) The complaint otherwise with the requirements of rule 11.

A. For parties without an Attorney I agree to provide the clerks office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the clerks office may result in a dismissal of my case.

Date of Signing: 11 / 23 / 2022

Signature of Plaintiff:



Printed name of Plaintiff: DEXTER ETTIENNE-MODESTE JR.

Prisoner Identification #: 200154154

Prison Address: 13850 N.W. 41 street

Doral  
City

FL  
state

33178  
Zip code

B. For Attorneys

Date of signing:

Signature of Attorney:

Printed name of Attorney:

Bar Number:

Name of Law Firm:

Address:

city

state

zipcode

Telephone Number:

E-Mail Address:



DEXTER ETIENNE-MODESTE JR. 200154154  
METRO WEST DETENTION CENTER 303  
13850 N.W. 41ST  
Doral FL 33178



Royal Palm PSC 330

FRI 02 DEC 2022

PRO-SE CLERKS OFFICE  
UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK  
500 Pearl St.  
New York, New York 10017

~~NOV 3  
2018~~

RECEIVED  
COURT PROSECUTION  
DIVISION - NY CIR

This correspondence originated at  
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